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Devon Self Storage Holdings (US) LLC

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8 UNITED STATES DISTRICT COURT

9 NORTHERN DISTRICT OF CALIFORNIA, SAN FRANCISCO DIVISION

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11 DEVON SELF STORAGE HOLDINGS (US)
LLC, a Delaware limited liability company,
12 Plaintiff,
13
14 vs.
15 BADER COMPANY, an Indiana corporation,
16 Defendant.

Case No. 3:17-cv-01419-SK

**STIPULATION AND ORDER RE
EXTENSION OF INITIAL CASE
MANAGEMENT AND ADR DEADLINES**

The Hon. Sallie Kim

1 This Stipulation is entered into with reference to the following facts (as set forth in the
2 accompanying Declaration of Carl D. Ciochon):

3 1. Defendant Bader Company has filed a Motion to Dismiss for Lack of Subject
4 Matter Jurisdiction or Alternatively, for Transfer of Venue. Bader's Motion to Dismiss is set for
5 hearing on June 26, 2017.

6 2. The Court's March 15, 2017 Order Setting Initial Case Management Conference
7 and ADR Deadlines sets an Initial Case Management Conference for June 19, 2017, prior to the
8 June 26 hearing on Bader's Motion to Dismiss.

9 3. The parties believe that it would be more efficient for both the Court and the parties
10 if the Initial Case Management Conference were continued to a date *after* the Court has ruled on
11 Bader's Motion to Dismiss. The parties further believe that it would be premature for them to
12 commit to an ADR process and a discovery schedule before the Court has ruled on Bader's
13 Motion to Dismiss, and that the meet and confer and related filing deadlines should also be
14 continued. Accordingly, the parties are respectfully requesting that the current deadlines be
15 extended by eight weeks, as set forth below.

16 WHEREFORE,

17 It is hereby stipulated, by and between undersigned counsel of record to extend the
18 relevant pre-trial deadlines as follows:

19 July 10, 2017:

- 20 ♦ Last day to meet and confer re: initial disclosures, early settlement, ADR process
21 selection, and discovery plan;
- 22 ♦ file ADR Certification signed by Parties and Counsel;
- 23 ♦ file either Stipulation to ADR Process or Notice of Need for ADR Phone
24 Conference;

25 July 24, 2017:

- 26 ♦ Last day to file Rule 26(f) Report, complete initial disclosures or state objection in
27 Rule 26(f) Report and file Case Management Statement per Standing Order re
28 Contents of Joint Case Management Statement.

August 7, 2017 (or such other date as the Court may propose):

► Initial Case Management Conference.

I received agreement from Benjamin Riley to this Stipulation and to submitting his signature on this Stipulation on May 30, 2017.

DATED: May 30, 2017

WENDEL, ROSEN, BLACK & DEAN LLP

By:

/s/ *Carl D. Ciochon*

Carl D. Ciochon
Attorneys for Plaintiff
Devon Self Storage Holdings (US) LLC

DATED: May 30, 2017

BARTKO, ZANKEL, BUNZEL & MILLER

By:

/s/ *Benjamin K. Riley*

Benjamin K. Riley
Attorneys for Defendant
Bader Company

PURSUANT TO STIPULATION, IT IS SO ORDERED.

DATED: May 31, 2017

Salie Ken

Sallie Kim
United States Magistrate Judge